IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT

IN AND FOR VOLUSIA COUNTY, FLORIDA

BRANDON BELNA,

Plaintiff,

v. Case No.: _____

NGP VAN, INC.;

BONTERRA, INC.;

SARAH CARTWRIGHT; and

DNC SERVICES CORP. / DEMOCRATIC NATIONAL COMMITTEE,

Defendants.

COMPLAINT FOR VIOLATION OF FLORIDA SECURITY OF COMMUNICATIONS ACT,

INTRUSION UPON SECLUSION, PUBLIC DISCLOSURE OF PRIVATE FACTS, CIVIL CONSPIRACY, NEGLIGENCE, AND RELATED RELIEF

Plaintiff Brandon Belna, appearing pro se, sues Defendants NGP VAN, Inc., Bonterra, Inc., Sarah Cartwright, and DNC Services Corp. / Democratic National Committee, and alleges as follows:

I. INTRODUCTION

1. This is a Florida civil action arising from suspected unauthorized electronic surveillance, interception, recording, disclosure, dissemination, and use of Plaintiff Brandon Belna's private communications and private activity inside his privately owned home in DeLand, Florida.

2. Plaintiff alleges that during his employment with NGP VAN, Inc. and/or Bonterra, Inc., Defendants used, caused the use of, authorized, allowed, benefitted from, or failed to prevent employer-controlled access to a company-owned laptop to monitor, intercept, record, disclose, or use Plaintiff's private communications and private home activity.

3. Plaintiff alleges that the company-owned laptop contained an integrated webcam and microphone and was subject to employer-controlled administrative, device-management, endpoint-security, remote-access, monitoring, logging, or similar technical controls.

4. Plaintiff alleges that he did not consent to Defendants activating, accessing, monitoring, intercepting, recording, disclosing, or using the webcam, microphone, audio, video, screen, private oral communications, electronic communications, or private activity occurring inside Plaintiff's home.

5. Plaintiff alleges that in or around March 2026, Defendants began or continued a course of unauthorized surveillance, monitoring, interception, recording, or access involving Plaintiff's company-owned laptop and private home environment.

6. Plaintiff alleges that in or around April 2026, Plaintiff and his wife had private conversations inside Plaintiff's home concerning deeply personal aspects of their marriage, home life, finances, emotional condition, family life, employment dispute, disability-related circumstances, and legal concerns.

7. Plaintiff alleges that over approximately the last month and a half, national media coverage, including coverage or commentary associated with CNN and MS NOW, has repeatedly referenced personal details about Plaintiff, Plaintiff's wife, and Plaintiff's private life that directly correlate with private conversations Plaintiff and his wife had inside their home.

8. Plaintiff did not publicly disclose those private conversations, did not authorize their recording, did not consent to employer surveillance of his private property, and did not consent to

disclosure of those private details to unions, the press, political organizations, media organizations, or government representatives.

9. Plaintiff alleges on information and belief that private information obtained from unauthorized surveillance, recording, interception, access, or use of Plaintiff's private communications or private activity was disclosed or disseminated to third parties, including unions, members of the press, media organizations, political organizations, and/or representatives or agencies of the federal government.

10. Plaintiff alleges on information and belief that Defendant Sarah Cartwright played a significant role in the surveillance, recording, disclosure, use, coordination, dissemination, or exploitation of Plaintiff's private communications or private information.

11. Plaintiff alleges on information and belief that Defendant DNC Services Corp. / Democratic National Committee received, used, acted upon, disseminated, coordinated around, or participated in the disclosure or use of private information obtained from Plaintiff's private communications or private activity.

12. Plaintiff brings claims under Florida's Security of Communications Act, Fla. Stat. §§934.03 and 934.10, and Florida common law for intrusion upon seclusion, public disclosure of private facts, civil conspiracy, negligence, and related relief.

13. Plaintiff seeks damages in excess of $1,000,000, or such greater amount as may be proven by the evidence at trial. Plaintiff further alleges that the total damages and punitive exposure may exceed $100,000,000 if discovery confirms the scope of the conduct alleged.

II. PARTIES

14. Plaintiff Brandon Belna is an individual residing at 710 Helen Ave, DeLand, Florida 32720.

15. Defendant NGP VAN, Inc. is a corporation or business entity that employed Plaintiff during the relevant period.

16. Defendant Bonterra, Inc. is a corporation or business entity that owned, operated, controlled, managed, supervised, administered, or acted jointly with NGP VAN, Inc. concerning Plaintiff's employment, company laptop, HR systems, technology systems, device-management systems, communications systems, accommodation process, internal records, and employment-related decisions.

17. Defendant Sarah Cartwright is an individual who, on information and belief, acted as an employee, manager, supervisor, human-resources representative, agent, decisionmaker, or representative of NGP VAN, Inc. and/or Bonterra, Inc. in connection with Plaintiff's employment, HR matters, internal communications, disability-related issues, workplace conduct, and/or the events described in this Complaint.

18. Defendant DNC Services Corp. / Democratic National Committee is a political organization and/or corporate entity. On information and belief, it received, used, acted upon, disseminated, coordinated around, or participated in the disclosure or use of private information concerning Plaintiff.

19. At all relevant times, Defendants acted individually, jointly, through agents, through employees, through representatives, through contractors, and/or in concert with one another.

20. At all relevant times, one or more Defendants possessed, controlled, used, maintained, or had access to systems, records, communications, or information relevant to Plaintiff's company-owned laptop, communications, private information, employment, and the dissemination of information concerning Plaintiff.

III. JURISDICTION AND VENUE

21. This Court has subject-matter jurisdiction because this is a Florida civil action seeking damages exceeding $50,000, exclusive of interest, costs, and attorney's fees.

22. Venue is proper in Volusia County, Florida because Plaintiff resides in Volusia County, Plaintiff's privately owned residence is located in Volusia County, the alleged surveillance and invasion of privacy occurred in Volusia County, Plaintiff's injuries occurred in Volusia County, and Defendants directed conduct toward Plaintiff in Volusia County.

23. Defendants NGP VAN, Inc. and Bonterra, Inc. are subject to personal jurisdiction in Florida because they employed Plaintiff in Florida, provided or controlled a company-owned laptop used by Plaintiff in Florida, directed communications and employment conduct toward Plaintiff in Florida, and caused injury to Plaintiff in Florida.

24. Defendant Sarah Cartwright is subject to personal jurisdiction in Florida because she directed communications, employment actions, privacy-related conduct, HR conduct, management conduct, or other conduct toward Plaintiff in Florida and caused injury to Plaintiff in Florida.

25. Defendant DNC Services Corp. / Democratic National Committee is subject to personal jurisdiction in Florida because, on information and belief, it received, used, disseminated, acted upon, coordinated around, or participated in the disclosure or use of private information unlawfully obtained from a Florida resident inside his Florida home, causing injury in Florida.

IV. FACTUAL ALLEGATIONS

A. Employment Background and Company-Owned Laptop

26. Plaintiff worked as a Software Engineer for NGP VAN, Inc. and/or Bonterra, Inc. during the relevant period.

27. NGP VAN, Inc. employed Plaintiff during the relevant period.

28. Bonterra, Inc. owned, operated, controlled, managed, supervised, administered, or acted jointly with NGP VAN, Inc. concerning Plaintiff's employment, HR matters, communications systems, technical systems, workplace policies, and employment-related decisions.

29. Plaintiff's employment-discrimination draft alleges that NGP VAN, Inc. employed Plaintiff and that Bonterra, Inc. acted as a parent, joint, integrated, or controlling employer with respect to Plaintiff's employment.

30. During Plaintiff's employment, Defendants provided Plaintiff with a company-owned laptop for work use.

31. The company-owned laptop contained an integrated webcam and microphone.

32. On information and belief, the company-owned laptop was subject to employer-controlled administrative privileges, device-management tools, endpoint-security tools, remote-access capabilities, monitoring tools, permissions controls, logging systems, and/or other technical controls.

33. On information and belief, Defendants NGP VAN, Inc. and/or Bonterra, Inc. had the ability to control, configure, audit, access, monitor, or review device activity, system logs, camera permissions, microphone permissions, endpoint-security records, device-management records, remote-access records, and related technical information concerning the company-owned laptop.

34. Plaintiff used the company-owned laptop from his privately owned residence at 710 Helen Ave, DeLand, Florida 32720.

35. Plaintiff used the laptop in private areas of his home where he had a reasonable expectation of privacy.

36. Plaintiff's private home spaces included spaces where Plaintiff and his wife discussed private marital, family, medical, financial, emotional, employment-related, legal, and personal matters.

37. Plaintiff did not consent to Defendants activating, accessing, monitoring, intercepting, recording, disclosing, or using the laptop's webcam, microphone, audio, video, screen, private oral communications, electronic communications, private home activity, or private conversations outside disclosed work communications for which recording notice and consent were provided.

38. Plaintiff did not receive notice that Defendants were activating or accessing the laptop's webcam or microphone to observe, listen to, intercept, record, or monitor Plaintiff inside his home.

39. Plaintiff did not authorize any Defendant to surveil, record, intercept, observe, or listen to his private property or private home life.

B. March 2026 Surveillance Indicators

40. In or around March 2026, Plaintiff began observing facts causing him to believe that Defendants were accessing, activating, monitoring, intercepting, recording, and/or using the company-owned laptop's webcam, microphone, or related monitoring functions without Plaintiff's knowledge or consent.

41. Those facts included company representatives referencing matters that appeared visible or audible only from Plaintiff's private home.

42. Those facts further included company representatives appearing to know or react to Plaintiff's private off-call conduct, private conversations, physical surroundings, or non-work activity.

43. Those facts further included unexpected activation or apparent activation of the laptop's camera indicator, microphone indicator, camera permissions, microphone permissions, or related system behavior.

44. Those facts further included laptop behavior consistent with remote access, remote monitoring, remote administration, remote logging, or unusual employer-controlled technical activity.

45. Those facts further included the presence, apparent presence, or operation of employer-controlled device-management, endpoint-security, remote-access, screen-sharing, permissions, recording, or monitoring tools.

46. Those facts further included comments by managers, HR personnel, coworkers, company representatives, or persons connected to the employment dispute implying that they had seen or heard Plaintiff outside disclosed meetings.

47. Plaintiff alleges that the technical details, logs, recordings, transcripts, access records, disclosure records, and communications proving the method and scope of access are primarily in Defendants' possession, custody, or control.

C. April 2026 Private Conversations and Later Dissemination

48. In or around April 2026, Plaintiff and his wife had private conversations inside their home concerning personal details of their life, marriage, family situation, health, emotional condi-

tion, finances, employment dispute, disability-related circumstances, and legal concerns.

49. Those April 2026 conversations occurred on Plaintiff's private property, inside Plaintiff's own home, without Defendants' consent rights, without any recording notice, and without Plaintiff's permission for any employer or third party to listen, observe, record, intercept, disclose, or use those communications.

50. Plaintiff alleges that those private conversations were not publicly disclosed by Plaintiff.

51. Plaintiff alleges that those private conversations were not disclosed by Plaintiff to CNN, MS NOW, unions, the press, the federal government, the DNC, Anthropic, PBC, Claude, or any other public-facing organization.

52. Plaintiff alleges on information and belief that Defendants intercepted, recorded, accessed, disclosed, used, or procured the interception, recording, access, disclosure, or use of Plaintiff's private oral, wire, or electronic communications and/or private information from Plaintiff's home.

53. Plaintiff alleges on information and belief that Defendants or persons acting with them disclosed or caused disclosure of private information obtained from Plaintiff's private communications or private activity to third parties, including unions, members of the press, media organizations, political organizations, and/or representatives or agencies of the federal government.

54. Plaintiff alleges on information and belief that private information from Plaintiff's home was disseminated through formal or informal channels to third parties that later referenced, used, acted upon, repeated, summarized, analyzed, or amplified that information.

55. Over approximately the last month and a half, Plaintiff observed repeated references in national media, including CNN and MS NOW, to personal details about Plaintiff's wife and Plaintiff's private life.

56. Plaintiff alleges that those media references directly correlated with private conversations Plaintiff and his wife had inside their home in April 2026.

57. Plaintiff alleges that these media references were not coincidental. The details referenced in public coverage correlated with private conversations that were not publicly disclosed by Plaintiff, were not consented to be recorded, and occurred inside Plaintiff's private residence.

58. Plaintiff alleges that the apparent source for those details was unauthorized surveillance, recording, interception, disclosure, or use of Plaintiff's private communications or private activity occurring inside his home, including through the company-owned laptop or related employer-controlled systems.

59. Plaintiff alleges that the dissemination of private information was connected to an effort to harm Plaintiff's professional reputation, personal life, marriage, legal claims, employment rights, privacy, credibility, and ability to obtain relief.

D. Allegations Concerning Sarah Cartwright

60. Plaintiff alleges on information and belief that Defendant Sarah Cartwright played a significant role in the unauthorized surveillance, recording, disclosure, use, coordination, dissemination, or exploitation of Plaintiff's private communications or private information.

61. Plaintiff bases this allegation on Sarah Cartwright's role in relevant employment, human-resources, management, communications, disability-related, or workplace events concerning Plaintiff.

62. Plaintiff further bases this allegation on the timing of events in March and April 2026, communications and conduct involving Plaintiff, and the apparent use or dissemination of private information after those events.

63. Plaintiff alleges on information and belief that Sarah Cartwright possessed, accessed, received, used, disclosed, forwarded, discussed, approved, coordinated, or acted on private information concerning Plaintiff that had been obtained without Plaintiff's consent.

64. Plaintiff alleges that discovery is necessary to determine the full scope of Sarah Cartwright's involvement, including communications, internal messages, HR records, device-access records, meeting records, disclosure records, and communications with third parties.

E. Allegations Concerning DNC Services Corp. / Democratic National Committee

65. Plaintiff alleges on information and belief that Defendant DNC Services Corp. / Democratic National Committee received, used, acted upon, disseminated, coordinated around, or participated in the disclosure or use of private information concerning Plaintiff.

66. Plaintiff alleges on information and belief that the DNC's involvement relates to the dissemination or use of private information obtained from Plaintiff's private communications, private home activity, employment dispute, disability-related circumstances, or private marital and family life.

67. Plaintiff alleges that the DNC's role, communications, recipients, senders, and records are not fully known to Plaintiff before discovery.

68. Plaintiff alleges that discovery is necessary to determine whether the DNC received, used, forwarded, discussed, analyzed, coordinated around, or further disseminated private information concerning Plaintiff, Plaintiff's wife, Plaintiff's home life, Plaintiff's employment dispute, or Plaintiff's legal claims.

69. Plaintiff does not presently possess the full records proving the method, scope, dates, access logs, recording files, transcripts, disclosures, recipients, or downstream dissemination of the

surveillance and private information because those records are in Defendants' possession, custody, or control or in the possession of third parties.

F. Relevant Evidence

70. Relevant evidence likely includes device-management logs, mobile-device-management records, endpoint-security logs, remote-access logs, webcam access records, microphone access records, operating-system logs, network logs, VPN logs, screen-sharing logs, cloud recordings, transcripts, Slack messages, Google Workspace records, Zoom or Google Meet metadata, HR records, internal emails, legal communications, preservation communications, media communications, communications with unions, communications with press organizations, communications with federal-government representatives, communications with political organizations, DNC communications, and communications concerning Plaintiff.

71. Relevant evidence also likely includes communications, transcripts, drafts, notes, metadata, editorial communications, source communications, booking communications, internal messages, prompts, artificial-intelligence outputs, or analytical records held by media and technology entities that received, referenced, analyzed, summarized, repeated, or disseminated private information concerning Plaintiff.

72. Plaintiff alleges that the evidence within Defendants' possession, custody, or control will show whether, when, how, and by whom Plaintiff's webcam, microphone, device, communications, and private information were accessed, intercepted, recorded, disclosed, used, or disseminated.

G. Harm

73. Defendants' conduct invaded Plaintiff's home, private communications, marriage, personal life, family life, employment rights, legal rights, and seclusion.

74. Defendants' conduct caused Plaintiff severe psychiatric harm, emotional distress, humiliation, anxiety, physical harm, financial harm, loss of privacy, reputational harm, employment harm, damage to family and marital privacy, medical worsening, and other damages.

75. Plaintiff alleges that the conduct was intentional, reckless, malicious, grossly negligent, or committed in conscious disregard of Plaintiff's privacy, dignity, property rights, marital privacy, and legal rights.

76. Plaintiff seeks damages believed to exceed $1,000,000, together with punitive damages, statutory damages, actual damages, compensatory damages, equitable relief, costs, and all other relief permitted by law.

V. COUNT I – VIOLATION OF FLORIDA SECURITY OF COMMUNICATIONS ACT

Fla. Stat. §§934.03 and 934.10 – Against NGP VAN, Inc., Bonterra, Inc., and Sarah Cartwright

77. Plaintiff realleges paragraphs 1 through 76 as if fully stated here.

78. Plaintiff's private oral communications, wire communications, electronic communications, and communications occurring inside his home were communications protected by Florida law.

79. Plaintiff had a reasonable expectation of privacy in his private conversations and private communications occurring inside his home.

80. Plaintiff did not consent to interception, recording, access, disclosure, or use of his protected communications.

81. Defendants intentionally intercepted, endeavored to intercept, or procured another person or entity to intercept Plaintiff's protected communications without Plaintiff's consent.

82. Defendants intentionally disclosed, used, endeavored to disclose, or endeavored to use the contents of Plaintiff's protected communications, knowing or having reason to know that the communications had been obtained without Plaintiff's consent.

83. Defendants' interception, disclosure, use, and/or procurement of interception, disclosure, or use violated Fla. Stat. §934.03.

84. Plaintiff is a person whose wire, oral, or electronic communications were intercepted, disclosed, or used in violation of Fla. Stat. §§934.03 through 934.09 and is therefore entitled to civil remedies under Fla. Stat. §934.10.

85. Defendants' conduct caused Plaintiff damages, including psychiatric harm, emotional distress, physical harm, financial harm, reputational harm, employment harm, loss of privacy, and other damages.

86. Plaintiff seeks actual damages, statutory or liquidated damages, punitive damages, equitable relief, attorney's fees and costs where available, and all other relief permitted by law.

VI. COUNT II – UNLAWFUL DISCLOSURE OR USE OF INTERCEPTED COMMUNICATIONS

Fla. Stat. §§934.03 and 934.10 – Against All Defendants

87. Plaintiff realleges paragraphs 1 through 76 as if fully stated here.

88. On information and belief, Plaintiff's protected communications or private information were intercepted, recorded, obtained, disclosed, or used without Plaintiff's consent.

89. On information and belief, Defendants disclosed, used, endeavored to disclose, endeavored to use, received, acted upon, disseminated, or further distributed the contents of Plaintiff's protected communications or private information.

90. Defendants knew, had reason to know, or recklessly disregarded that the information had been obtained from Plaintiff's private communications, private home activity, or private affairs without Plaintiff's consent.

91. Defendants' disclosure or use caused Plaintiff psychiatric harm, emotional distress, physical harm, financial harm, reputational harm, employment harm, loss of privacy, and other damages.

92. Plaintiff is entitled to relief under Fla. Stat. §934.10 and all other applicable law.

VII. COUNT III – INTRUSION UPON SECLUSION / INVASION OF PRIVACY

Against NGP VAN, Inc., Bonterra, Inc., and Sarah Cartwright

93. Plaintiff realleges paragraphs 1 through 76 as if fully stated here.

94. Plaintiff had a reasonable expectation of privacy inside his privately owned home at 710 Helen Ave, DeLand, Florida 32720.

95. Plaintiff's home, private conversations, marital communications, personal life, non-work activity, medical information, financial information, legal communications, and private affairs were private matters and concerns.

96. Defendants intentionally intruded, physically, electronically, technologically, or otherwise, upon Plaintiff's solitude, seclusion, private affairs, private communications, and private home life.

97. Defendants' intrusion was highly offensive to a reasonable person because it involved suspected unauthorized webcam access, microphone access, surveillance, recording, monitor-

ing, interception, disclosure, and use of private communications and private activity inside Plaintiff's home.

98. Defendants' conduct caused Plaintiff severe psychiatric harm, emotional distress, humiliation, anxiety, physical harm, financial harm, reputational harm, employment harm, loss of privacy, and other damages.

99. Plaintiff seeks compensatory damages, punitive damages, equitable relief, costs, and all other relief permitted by law.

VIII. COUNT IV – PUBLIC DISCLOSURE OF PRIVATE FACTS

Against All Defendants

100. Plaintiff realleges paragraphs 1 through 76 as if fully stated here.

101. Plaintiff's private marital, family, medical, emotional, financial, home-life, employment-dispute, disability-related, legal, and personal information were private facts not publicly disclosed by Plaintiff.

102. On information and belief, Defendants publicized, disclosed, caused disclosure of, disseminated, or participated in the dissemination of those private facts to third parties, including unions, press organizations, media organizations, federal-government representatives, political organizations, and/or the public.

103. The disclosure of those facts would be highly offensive to a reasonable person.

104. The disclosed facts were not of legitimate public concern in the manner and context in which they were allegedly obtained, disclosed, or used.

105. Defendants' conduct caused Plaintiff psychiatric harm, emotional distress, humiliation, anxiety, physical harm, financial harm, reputational harm, employment harm, loss of privacy, and other damages.

IX. COUNT V – CIVIL CONSPIRACY

Against All Defendants

106. Plaintiff realleges paragraphs 1 through 76 as if fully stated here.

107. On information and belief, two or more Defendants and/or their agents, employees, representatives, contractors, or co-conspirators agreed to intercept, record, access, disclose, use, disseminate, or exploit Plaintiff's private communications or private information.

108. The object of the agreement was to obtain, use, disclose, or disseminate private information about Plaintiff, Plaintiff's wife, Plaintiff's employment dispute, Plaintiff's disability-related circumstances, Plaintiff's private home life, Plaintiff's marriage, or Plaintiff's personal affairs.

109. Overt acts in furtherance of the conspiracy included unauthorized access to Plaintiff's company-owned laptop, unauthorized activation or use of webcam or microphone capabilities, use of device-management or remote-access systems, internal sharing of private information, disclosure to unions, disclosure to the press, disclosure to federal-government representatives, disclosure to political organizations, disclosure to or use by DNC Services Corp. / Democratic National Committee, and use of private information in employment, reputational, media, political, or retaliatory contexts.

110. Plaintiff was damaged by the conspiracy.

111. Plaintiff seeks compensatory damages, punitive damages, equitable relief, costs, and all other relief permitted by law.

X. COUNT VI – NEGLIGENCE / NEGLIGENT SECURITY AND CONTROL OF EMPLOYER SYSTEMS

Against NGP VAN, Inc. and Bonterra, Inc., in the Alternative

112. Plaintiff realleges paragraphs 1 through 76 as if fully stated here.

113. Defendants NGP VAN, Inc. and Bonterra, Inc. owed Plaintiff a duty to exercise reasonable care in controlling, securing, auditing, monitoring, and limiting access to employer-owned devices, remote-access systems, device-management systems, endpoint-security systems, communications systems, recordings, logs, transcripts, private employee information, and systems capable of accessing Plaintiff's webcam, microphone, screen, communications, or private information.

114. Defendants breached that duty by failing to prevent unauthorized access, monitoring, recording, interception, disclosure, or use of Plaintiff's private communications, private information, and private home activity.

115. Defendants further breached that duty by failing to investigate, preserve evidence, restrict access, audit relevant systems, prevent dissemination, and protect Plaintiff after Defendants knew or should have known that Plaintiff's private information had been accessed, recorded, disclosed, used, or disseminated.

116. Defendants' negligence caused Plaintiff psychiatric harm, emotional distress, physical harm, financial harm, reputational harm, employment harm, loss of privacy, and other damages.

XI. ANTICIPATED NON-PARTY DISCOVERY TARGETS AND PRESERVATION-RELATED ALLEGATIONS

117. Plaintiff anticipates seeking discovery from Defendants concerning the company-owned laptop, device-management systems, endpoint-security tools, remote-access tools, webcam and microphone access logs, operating-system logs, network logs, cloud recordings, transcripts, HR records, internal emails, Slack messages, Google Workspace records, Zoom or Google Meet metadata, media communications, union communications, federal-government communications, political-organization communications, DNC communications, and communications concerning Plaintiff.

118. Plaintiff also anticipates seeking non-party discovery, subpoenas, preservation, or records from media and technology entities that may possess evidence concerning the disclosure, dissemination, receipt, republication, use, discussion, analysis, or summarization of Plaintiff's private information.

119. Anticipated non-party discovery targets include CNN, MS NOW, and Anthropic, PBC / Claude, to the extent those entities possess broadcasts, transcripts, drafts, notes, metadata, communications, prompts, outputs, editorial communications, source communications, booking communications, internal messages, or records reflecting references to Plaintiff, Plaintiff's wife, Plaintiff's private home life, Plaintiff's employment dispute, Plaintiff's disability-related circumstances, or private information allegedly derived from unauthorized surveillance, interception, disclosure, or dissemination.

120. Plaintiff does not presently allege that CNN, MS NOW, or Anthropic, PBC / Claude are Defendants in this action. Plaintiff identifies them as anticipated non-party discovery targets because Plaintiff believes they may possess relevant information concerning how private information about Plaintiff was obtained, referenced, transmitted, analyzed, summarized, republished, or disseminated.

121. Plaintiff requests that Defendants preserve all communications with CNN, MS NOW, Anthropic, PBC / Claude, unions, press organizations, media organizations, federal-government representatives, political organizations, and any other persons or entities concerning Plaintiff, Plaintiff's wife, Plaintiff's private communications, Plaintiff's private home life, Plaintiff's employment, Plaintiff's disability-related circumstances, or Plaintiff's legal claims.

122. Plaintiff further requests that Defendants preserve all documents, communications, recordings, transcripts, logs, metadata, source materials, media talking points, public-relations communications, artificial-intelligence prompts or outputs, and internal communications relating to Plaintiff or the matters alleged in this Complaint.

XII. DAMAGES

123. Plaintiff suffered damages including psychiatric harm, emotional distress, anxiety, humiliation, physical harm, financial harm, lost income, lost earning capacity, loss of privacy, reputational harm, employment harm, damage to marital and family privacy, medical worsening, inconvenience, and other compensable injuries.

124. Plaintiff alleges that the damages are substantial and may exceed $100,000,000 if discovery confirms the scope of unauthorized surveillance, interception, disclosure, dissemination, downstream use, reputational destruction, psychiatric injury, physical harm, financial harm, employment harm, and punitive-damages exposure alleged in this Complaint.

125. Plaintiff seeks damages in excess of $1,000,000, or such greater amount as may be proven by the evidence at trial.

126. Defendants' conduct was intentional, willful, malicious, reckless, grossly negligent, or committed in reckless disregard of Plaintiff's rights, supporting punitive damages where permitted by law.

XIII. REQUEST FOR RELIEF

Plaintiff respectfully requests that the Court enter judgment in his favor and against Defendants and award:

A. Actual damages;

B. Statutory or liquidated damages under Fla. Stat. §934.10;

C. Compensatory damages;

D. Punitive damages to the extent permitted by law;

E. Preliminary, equitable, declaratory, or injunctive relief as appropriate;

F. Injunctive relief requiring preservation of evidence and prohibiting further use or disclosure of unlawfully obtained communications or private information;

G. An order requiring Defendants to identify, preserve, and produce recordings, transcripts, logs, access records, device-management records, remote-access records, webcam records, microphone records, dissemination records, and communications concerning Plaintiff;

H. Prejudgment and post-judgment interest;

I. Costs and attorney's fees where authorized by law; and

J. Any other relief the Court deems just and proper.

XIV. JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

Respectfully submitted,

Dated: _____

_____

Brandon Belna

710 Helen Ave

DeLand, FL 32720

Phone: 407 907 5136

Email: bbelna@proton.me

Plaintiff, pro se

VERIFICATION

STATE OF FLORIDA

COUNTY OF VOLUSIA

I, Brandon Belna, declare under oath that I am the Plaintiff in this action; that I have read the foregoing Complaint; and that the factual allegations are true and correct to the best of my personal knowledge, except as to matters alleged on information and belief, and as to those matters, I believe them to be true based on the facts presently available to me.

_____

Brandon Belna

Sworn to or affirmed and subscribed before me this _____ day of _____, 2026, by Brandon Belna, who is personally known to me or who produced _____ as identification.

_____

Notary Public, State of Florida

Print Name: _____

Commission No.: _____

My Commission Expires: _____